

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re		:
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AIO US, INC., <i>et al.</i> , ¹		:
		:
Debtors.		:
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**NOTICE OF *SECOND AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 4, 2024 AT 9:30 A.M. (ET), BEFORE THE HONORABLE
CRAIG T. GOLDBLATT, AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, 6th FLOOR, COURTROOM 1**

This hearing will be a hybrid hearing that will be conducted via Zoom and in-person in Courtroom #1, 6th floor. Any party who seeks to examine or cross-examine any witnesses must do so in-person. The deadline to register for remote attendance is 4:00 p.m. (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.

COURTCALL WILL NOT BE USED FOR THIS HEARING. To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the Court's website at www.deb.uscourts.gov

I. CONTESTED MATTERS

1. Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 65](#) – filed August 14, 2024]

Objection / Response Deadline: November 15, 2024 at 4:00 p.m. (ET); extended to November 20, 2024 for the Office of the United States Trustee

¹ A complete list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number is available at <https://dm.epiq11.com/case/aiousinc/info>. The Debtors' mailing and service address is 4 International Drive, Suite 110, Rye Brook, New York 10573.

² Amended items appear in bold.

Objections / Responses Received:

- A. Preliminary Objection of the Official Committee of Unsecured Creditors to, and Motion to Adjourn the Hearing on, Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Nature & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 163](#) – filed September 19, 2024]
 - (i). Motion to Shorten Notice Regarding Preliminary Objection of the Official Committee of Unsecured Creditors to, and Motion to Adjourn the Hearing on, Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 164](#) – filed September 19, 2024]
 - (ii). Order Shortening Notice Regarding Preliminary Objection of the Official Committee of Unsecured Creditors to, and Motion to Adjourn the Hearing on, Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 173](#) – entered September 20, 2024]
- B. (SEALED) Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [Docket No. 398 – filed November 15, 2024] (the “Committee’s 9019 Objection”)
 - (i). (SEALED) Declaration of Lucas H. Self in Support of Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [Docket Nos. 399 & 400 – filed November 15, 2024]
 - (ii). Motion for Leave to Exceed Page Limit with Respect to the Response of the Official Committee of Unsecured Creditors to the Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and

- 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &CO Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 401](#) – filed November 15, 2024]
- (iii). (REDACTED) Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 476](#) – filed November 20, 2024]
 - (iv). Motion to File Under Seal Certain Information Contained in the Objection of the Official Committee of Unsecured Creditors to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &CO Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 479](#) – filed November 20, 2024] (the “Motion to Seal”)³
 - (v). United States Trustee’s Omnibus Objection to the Official Committee of Unsecured Creditors’ Motion to Seal Certain Information in Connection with its (I) Motion to Dismiss Chapter 11 Cases, and (II) Objection to the Debtors’ 9019 Motion [[Docket No. 517](#) – filed November 27, 2024]
- C. United States Trustee’s Objection to Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement With Natura & Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 445](#) – filed November 20, 2024] (the “U.S. Trustee’s 9019 Objection”)
 - D. **United States Trustee’s Objection to the Notice of (I) Revised Terms of (A) Debtors’ Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially All of the Debtors’ Assets to Natura &Co, and (II) Updated Hearing Date with Respect to Debtors’ Settlement and Sale Motions** [[Docket No. 543](#) – filed December 3, 2024]
 - E. **Hartford’s Objection and Reservation of Rights in Connection with Proposed Settlement and Sale** [[Docket No. 544](#) – filed December 3, 2024]

³ By agreement of the parties, the hearing on the Motion to Seal is adjourned to the omnibus hearing scheduled for December 18, 2024 at 11:30 a.m. (ET).

F. Certain Insurers’ (I) Objection to Approval of Revised Terms of (A) Debtors’ Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially All of the Debtors’ Assets to Natura &Co, and (II) Reservation of Rights [[Docket No. 549](#) – filed December 3, 2024]

Related Documents:

- i. Notice of Motion and Hearing [[Docket No. 68](#) – filed August 15, 2024]
- ii. Declaration of Philip J. Gund in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 96](#) – filed August 30, 2024]
- iii. Declaration of John S. Dubel in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 97](#) – filed August 30, 2024]
- iv. Order Regarding Scheduling with Respect to the Motion of the Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 320](#) – entered October 29, 2024]
- v. Notice of Hearing Regarding Motion of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement with Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [[Docket No. 321](#) – filed October 29, 2024]
- vi. (SEALED) Natura’s Omnibus Reply in Support of (1) Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof and (III) Granting Related Relief and (2) Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors’ Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction and Sale Hearing and (E) Approving Assumption and Assignment Procedures; (II) Authorizing the Sale of

the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances; and (III) Granting Related Relief [Docket No. 510 – filed November 26, 2024]

- vii. (SEALED) Debtors' Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections [Docket No. 511 – filed November 26, 2024]
- viii. (SEALED) Christina A. Costello's Declaration in Support of Natura's Omnibus Reply in Support of (1) Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof and (III) Granting Related Relief and (2) Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors' Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction and Sale Hearing and (E) Approving Assumption and Assignment Procedures; (II) Authorizing the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances; and (III) Granting Related Relief [Docket No. 512 – filed November 26, 2024]
- ix. (SEALED) Declaration of Jessica Falk in Support of Debtors' Reply to the Official Committee of Unsecured Creditors' Objection to Debtors' Motion for Entry of an Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. And Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [Docket No. 516 – filed November 27, 2024]
- x. Notice of (I) Revised Terms of (A) Debtors' Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially all of the Debtors' Asset to Natura &Co, and (II) Updated Hearing Date with Respect to Debtors' Settlement and Sale Motion [[Docket No. 534](#) – filed November 27, 2024] (the "Settlement Notice")
- xi. **(REDACTED) Debtors' Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections [[Docket No. 555](#) – filed December 3, 2024]**
- xii. **Notice of Filing of (I) Second Amendment to Stock and Asset Purchase Agreement and (II) Revised Settlement Agreement [[Docket No. 557](#) – filed December 3, 2024]**
- xiii. **(REDACTED) Declaration of Jessica Falk in Support of Debtors' Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections [[Docket No. 559](#) – filed December 3, 2024]**

Witnesses and Exhibits:

- a. **Debtors' Exhibit List for Hearing Scheduled for December 4, 2024** [[Docket No. 547](#) – filed December 3, 2024]
- b. **Debtors' Witness List for Hearing Scheduled for December 4, 2024** [[Docket No. 548](#) – filed December 3, 2024]

Status: As discussed on the record at the November 27, 2024 hearing, the Committee's 9019 Objection is resolved as a result of the settlement announced at such hearing and as described in the Settlement Notice (the "Settlement"). The Debtors are in discussions with the Office of the United States Trustee (the "U.S. Trustee") regarding the U.S. Trustee's 9019 Objection and any process-related concerns that the U.S. Trustee may have regarding the Settlement. The hearing on this matter is going forward.

- 2. Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II) Authorizing the Sale of the Debtors Assets Free and Clear of Liens, Claims, Interests, and Encumbrances; and (III) Granting Related Relief [[Docket No. 64](#) – filed August 14, 2024]

Sale Objection / Response Deadline: November 22, 2024 at 4:00 p.m. (ET)

Sale Objections / Responses Received:

- A. (SEALED) Limited Objection and Reservation of Rights of the Avon Company Regarding Debtors' Proposed Sale of Assets [Docket No. 491 – filed November 22, 2024]
 - (i). (REDACTED) Limited Objection and Reservation of Rights of the Avon Company Regarding Debtors' Proposed Sale of Assets [[Docket No. 523](#) – filed November 27, 2024]
 - (ii). Motion of the Avon Company (f/k/a New Avon Company, New Avon LLC and C-A NA LLC) to File Limited Objection and Reservation of Rights Under Seal [[Docket No. 524](#) – filed November 27, 2024]
 - (iii). Motion to Shorten Notice Regarding Motion of the Avon Company (f/k/a New Avon Company, New Avon LLC and C-A NA LLC) to File Limited Objection and Reservation of Rights Under Seal [[Docket No. 525](#) – filed November 27, 2024]

Status: The Debtors, Natura and the Avon Company are in discussions regarding resolving this objection. The hearing on this objection is going forward.

- B. (SEALED) Objection of the Official Committee of Unsecured Creditors to the Sale of Debtors' Assets Pursuant to the Stalking Horse Agreement [Docket No. 492 – filed November 22, 2024] (the “Committee’s Sale Objection”)
- (i). (SEALED) Declaration of Matthew Kutcher in Support of the Objection of the Official Committee of Unsecured Creditors to the Sale of the Debtors' Assets Pursuant to the Stalking Horse Agreement [Docket No. 493 – filed November 22, 2024]

Status: As a result of the Settlement, the Committee’s Sale Objection is resolved.

- C. (SEALED) Corrected Objection of the Official Committee of Unsecured Creditors to the Sale of the Debtors' Assets Pursuant to the Stalking Horse Agreement [Docket No. 503 – filed November 25, 2024] (the “Committee’s Corrected Sale Objection”)
- (i). (SEALED) Corrected Declaration of Matthew Kutcher in Support of the Objection of the Official Committee of Unsecured Creditors to the Sale of the Debtors' Assets Pursuant to the Stalking Horse Agreement [Docket No. 504 – filed November 25, 2024]

Status: As a result of the Settlement, the Committee’s Corrected Sale Objection is resolved.

- D. **United States Trustee’s Objection to the Notice of (I) Revised Terms of (A) Debtors’ Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially All of the Debtors’ Assets to Natura &Co, and (II) Updated Hearing Date with Respect to Debtors’ Settlement and Sale Motions** [[Docket No. 543](#) – filed December 3, 2024]
- E. **Hartford’s Objection and Reservation of Rights in Connection with Proposed Settlement and Sale** [[Docket No. 544](#) – filed December 3, 2024]
- F. **Certain Insurers’ (I) Objection to Approval of Revised Terms of (A) Debtors’ Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially All of the Debtors’ Assets to Natura &Co, and (II) Reservation of Rights** [[Docket No. 549](#) – filed December 3, 2024]

Cure Objection / Response Deadline: November 1, 2024 at 4:00 p.m. (ET)

Supplemental Cure Objection / Response Deadline: December 3, 2024 at 4:00 p.m. (ET)

Cure Objections / Responses Received:

- A. Objection of Cigna to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection With Sale [[Docket No. 331](#) – filed October 31, 2024]

Status: The Debtors have resolved this objection through language in a revised proposed sale order to be submitted to the Court in advance of the hearing.

- B. Limited Objection and Reservation of Rights of the Travelers Indemnity Company and Certain of Its Property Casualty Affiliates to Debtors' Notice of Potential Cure Costs and Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [[Docket No. 341](#) – filed November 1, 2024]

Status: **The Debtors believe that the objection will be resolved.** At this time, the hearing on this objection is going forward.

- C. Limited Objection and Reservation of Rights of HCL America Inc. and HCL Technologies Limited to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection With Sale [[Docket No. 364](#) – filed November 8, 2024]

Status: **The objection is resolved.**

- D. Informal response from Denнемeyer S.A.

Status: **The informal response is resolved.**

Related Documents:

- i. Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [[Docket No. 288](#) – filed October 18, 2024]
- ii. Notice of Sale, Bidding Procedures, Auction, and Sale Hearing [[Docket No. 290](#) – filed October 22, 2024]
- iii. Order (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (E) Approving Assumption and Assignment Procedures; (II) Granting Related Relief [[Docket No. 319](#) – entered October 29, 2024]

- iv. Notice of Cancellation of Auction and Designation of Successful Bidder [[Docket No. 415](#) – filed November 18, 2024]
- v. Supplemental Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [[Docket No. 429](#) – filed November 19, 2024]
- vi. Notice of Filing [Proposed] Order (I) Approving the Sale of Substantially All of the Debtors’ Asset Free and Clear of All Non-Assumed Liens, Claims, Encumbrances and Interests, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[Docket No. 509](#) – filed November 26, 2024]
- vii. (SEALED) Natura’s Omnibus Reply in Support of (1) Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof and (III) Granting Related Relief and (2) Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors’ Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction and Sale Hearing and (E) Approving Assumption and Assignment Procedures; (II) Authorizing the Sale of the Debtors’ Assets Free and Clear of Liens, Claims, Interests, and Encumbrances; and (III) Granting Related Relief [Docket No. 510 – filed November 26, 2024]
- viii. (SEALED) Debtors’ Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections [Docket No. 511 – filed November 26, 2024]
- ix. (SEALED) Christina A. Costello’s Declaration in Support of Natura’s Omnibus Reply in Support of (1) Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. and Affiliates, (II) Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof and (III) Granting Related Relief and (2) Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sale of Substantially All of the Debtors’ Assets, (B) Authorizing Designation of Stalking Horse Bidder, (C) Authorizing Conduct of the Auction and Sale Hearing, (D) Approving Form and Manner of Notice of Sale, Auction and Sale Hearing and (E) Approving Assumption and Assignment Procedures; (II) Authorizing the Sale of the Debtors’ Assets Free and Clear of Liens, Claims, Interests, and Encumbrances; and (III) Granting Related Relief [Docket No. 512 – filed November 26, 2024]
- x. Declaration of John S Dubel in Support of Substantially All of the Debtors’ Assets [[Docket No. 513](#) – filed November 27, 2024]

- xi. Supplemental Declaration of Marcelo Messer in Support of Sale of Substantially All of the Debtors' Assets [[Docket No. 514](#) – filed November 27, 2024]
- xii. Notice of Filing of Amendment to Stock and Asset Purchase Agreement with Stalking Horse Bidder [[Docket No. 515](#) – filed November 27, 2024]
- xiii. (SEALED) Declaration of Jessica Falk in Support of Debtors' Reply to the Official Committee of Unsecured Creditors' Objection to Debtors' Motion for Entry of an Order (I) Approving Settlement Agreement With Natura &Co Holding S.A. And Affiliates, (II Authorizing the Debtors to Take Any and All Actions Necessary to Effectuate the Terms Thereof, and (III) Granting Related Relief [Docket No. 516 – filed November 27, 2024]
- xiv. Notice of (I) Revised Terms of (A) Debtors' Proposed Settlement with Natura &Co and (B) Proposed Sale of Substantially all of the Debtors' Asset to Natura &Co, and (II) Updated Hearing Date with Respect to Debtors' Settlement and Sale Motion [[Docket No. 534](#) – filed November 27, 2024]
- xv. **(REDACTED) Debtors' Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections** [[Docket No. 555](#) – filed December 3, 2024]
- xvi. **Notice of Filing of (I) Second Amendment to Stock and Asset Purchase Agreement and (II) Revised Settlement Agreement** [[Docket No. 557](#) – filed December 3, 2024]
- xvii. **Notice of Filing of Revised Order (I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of All Non-Assumed Liens, Claims, Encumbrances and Interests, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (III) Granting Related Relief** [[Docket No. 558](#) – filed December 3, 2024]
- xviii. **(REDACTED) Declaration of Jessica Falk in Support of Debtors' Omnibus Reply in Support of 9019 Motion and Sale Motion and in Response to Objections** [[Docket No. 559](#) – filed December 3, 2024]

Witnesses and Exhibits:

- a. **Debtors' Exhibit List for Hearing Scheduled for December 4, 2024** [[Docket No. 547](#) – filed December 3, 2024]
- b. **Debtors' Witness List for Hearing Scheduled for December 4, 2024** [[Docket No. 548](#) – filed December 3, 2024]

Status: The hearing on this matter is going forward.

Dated: December 4, 2024
Wilmington, Delaware

/s/ Huiqi Liu

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